



1 answering briefs. Counsel is also responsible for other substantive non-litigation matters in the Office  
2 of General Counsel. The Office of General Counsel also currently has a number of attorneys out on  
3 extended leaves of absence, in addition to staff attrition, which has increased the undersigned's  
4 workload.

5 Additional time is required to review the record, to evaluate the numerous issues raised in  
6 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's  
7 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as  
8 possible. This request is made in good faith and with no intention to unduly delay the proceedings,  
9 and counsel apologizes for any inconvenience.

10 On June 1, 2021, counsel for Defendant conferred with Plaintiff's counsel, who has no  
11 opposition to this motion.

12 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
13 to Plaintiff's Motion for Reversal and Remand, through and including July 16, 2021.

14  
15 Dated: June 1, 2021

Respectfully submitted,

16 CHRISTOPHER CHIOU  
17 Acting United States Attorney

18 /s/ Margaret Lehrkind  
19 MARGARET LEHRKIND  
Special Assistant United States Attorney

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22 IT IS SO ORDERED:

23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: June 4, 2021  
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